

Serial No.: 09/400,346

Attorney Docket No: MCS-058-89

REMARKS

In response to the Office Action dated June 18, 2003, the following arguments are presented. Claims 1-20, 93 and 94 remain in the case. In light of the arguments set forth in this response, reexamination and reconsideration of the application are requested.

Rebuttal to "Response to Amendments and Arguments"

In the "Response to Amendments and Arguments" section, the Examiner stated that the "Applicant's arguments are directed toward various portions of Sambonsugi cited by the Examiner. The Examiner points out that the rejections were based upon the entire reference. Therefore, Applicant is urged to consider the reference as a whole. When considering the cited portions within context the whole patent, it is seen that the claimed invention is rendered obvious."

In response, the Applicants have considered the Sambonsugi et al. reference as a whole and respectfully disagree with the Examiner's interpretation of the reference. After a thorough re-reading of the Sambonsugi et al. reference, the Applicants still cannot agree with the Examiner's position. In particular, it is the Applicants' position that their claimed invention is patentable over the Sambonsugi et al. reference. Even after a careful reading of the entire Sambonsugi et al. reference as well as the portions of Sambonsugi et al. cited by the Examiner, the Applicants conclude that their claimed invention is patentable over Sambonsugi et al.. The Applicants respectfully request the Examiner to direct the Applicants to specific sections or passages in the Sambonsugi et al. reference that teach the Applicants' claimed invention.

Examiner's Rationale

The Examiner states that the "Applicant's arguments with regard to claims 1-20 and 93-94 have been fully considered, but are not considered persuasive because of the following reasons: The Applicant argues that Sambonsugi does not teach the predictions for a value of each of the plurality of pixels but rather teaches the shape prediction base on

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the known pixel value. The Examiner agrees that Sambonsugi teaches the shape prediction. However, Sambonsugi also teaches the detections (predictions) base in the pixel value of the plurality of pixels (respective pixels) (column 4, lines 20-36 and 48-55) in order to predict the shape or position of object within images. Thus, it is clear that Sambonsugi teaches the predictions for a value of each of the plurality of pixels."

Applicants' Argument

The Applicants respectfully disagree with the Examiner's rationale. The Applicants believe that Sambonsugi et al. do not teach the Applicants' claimed feature of making predictions for a value of each pixel. Independent claims 1, 11, 16, 93 and 94 all claim variations of this material feature.

The Examiner and the Applicants agree that Sambonsugi et al. teach shape prediction. However, the Applicants respectfully disagree with the Examiner's assertion that the "detecting difference values between the respective pixels" as taught by Sambonsugi et al. (col. 4, lines 19-21) anticipates the Applicants' claimed feature of making predictions for a value of each pixel. The Applicants offer the following:

1. Detection is different from prediction: "Detect", given its plain meaning, means to "discover or determine the existence, presence, or fact of". "Predict", given its plain meaning, means to "foretell" and "to declare in advance" (Webster's Ninth New Collegiate Dictionary). In order to detect a value, the value must already exist or be known. On the other hand, to predict a value means that the value is unknown at the time the prediction is made and its quantity is being declared (or guessed) in advance (i.e., its quantity is being foretold).

Moreover, the Applicants disagree with the Examiner's rationale that Sambonsugi et al. are detecting the pixel values of the respective pixels. In reality, difference values are being detected, not pixel values of the respective pixels.

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In particular, Sambonsugi et al. merely teach to detect (or determine) "difference values" (col. 4, lines 20-21). A difference value is the difference (or subtraction) between the pixel values of the respective pixels. More specifically, these difference values are contained in a difference image, which is a difference between "the current frame and the first or second reference frame" (col. 4, lines 21-23). In Sambonsugi et al., pixel values of the respective pixels are not being detected. Only the difference values are being detected.

In addition, detecting difference values between respective pixels means that pixel values of the respective pixels are already known. Again, the pixel values of the respective pixels are not being detected; these pixel values are known. Only difference values are being determined. In order for a difference value to be calculated, pixel values of the respective pixels are subtracted. The pixel values must be known before a difference value can be computed. A difference cannot be determined from unknown values!

On the other hand, the Applicants' claimed invention includes making predictions for a value of each pixel. These are *predictions*, meaning that the pixel value for each pixel is unknown.

2. Applicants make multiple predictions for each pixel value: The Applicants' claimed invention includes making predictions for a value of each pixel. Please note that the term "predictions" is in the plural. In other words, multiple predictions are made for each pixel value. This is taught in the Applicants' specification when it states that the Applicants' claimed invention "uses a predictive technique and associated prediction parameters to provide multiple predictions about the value of a pixel in a subsequent frame. Any pixel that deviates significantly from these

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predicted values is classified as a foreground pixel; otherwise, the pixel is classified as a background pixel" (page 24, lines 3-7; emphasis added).

Sambonsugi et al. merely calculate difference values between respective pixels. A single detection of a difference value is made for each pair of the respective pixels. In particular, Sambonsugi et al. state that "a difference value detector section 31 is used to obtain the difference between the current frame and the first and second reference frames" (col. 15, lines 50-52). Further reading of Sambonsugi et al. states that a single difference value is detected for each pair of the respective pixels (col. 15, lines 53-63).

Based on the arguments above and below, the Applicants respectfully maintain that their claimed feature of providing predictions for a value of each pixel in an image sequence is not taught or disclosed by Sambonsugi et al.. Accordingly, the Applicants respectfully request the Examiner to pass this application to issue.

Section 102(e) Rejections

The Office Action rejected claims 1-7, 11-19, 93 and 94 under 35 U.S.C. § 102(e) as being anticipated by Sambonsugi et al. (U.S. Patent No. 6,335,985). The Office Action stated that Sambonsugi et al. disclose each and every element of the Applicants' claimed invention.

In response, the Applicants respectfully traverse these rejections based on the following legal and technical analysis. In general, the Applicants submit that Sambonsugi et al. lack at least one feature of the Applicants' claimed invention. In particular, Sambonsugi et al. do not disclose, either explicitly or implicitly, the material claimed feature of providing predictions for a value of each pixel. Moreover, regarding independent claim 94, Sambonsugi et al. further do not disclose, either explicitly or implicitly, the material claimed feature of calculating predictions for a value of each pixel

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based on an actual history of the predicted pixel and a predicted history of the predicted pixel.

Independent Claim 1

Independent claim 1 of the Applicants' claimed invention includes a system for maintaining a background model of an image sequence having a plurality of pixels. The system further includes a pixel processing module that processes the image sequence on a pixel scale. In addition, the system includes a prediction module that provides predictions for a value of each of the plurality of pixels. The system also includes at least one refinement module that processes the image sequence on a spatial scale other than the pixel scale.

The Applicants' specification includes an example implementation of the claimed material feature of providing predictions for a value of each of the pixels. Specifically, the Applicants' specification sets forth a working example whereby there are two predictions of pixel value are made for each pixel. One of the predictions is based on actual history and the other prediction is based on the predicted history of a pixel (page 28, lines 3-5). If the actual value of pixel differs from either one of its two predicted values by more than a certain amount, then that pixel is declared a foreground pixel (page 28, lines 2-3). Note that multiple predictions of an unknown pixel value are made.

In striking contrast, Sambonsugi et al., merely teach a system and method that make a single detection of a difference value using known pixel values. Detection is different from prediction. In Sambonsugi et al., the pixel values are not being detected; these pixel values already are known. Only a difference between the pixel values is being determined. The pixel values must be known before the pixel values can be subtracted to detect a difference value. A difference cannot be determined from unknown values.

The Applicants, therefore, respectfully traverse this rejection of independent claim 1 because Sambonsugi et al. do not disclose, either explicitly or implicitly, the

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material claimed feature of predictions for a value of each of the plurality of pixels. Because of this missing feature, the §102 rejection cannot stand.

Independent Claim 11

Independent claim 11 includes a computer-readable medium having computer-executable modules. These modules include a pixel processing module that processes an image sequence on a pixel scale. The pixel processing module further includes a prediction module that calculates predictions for a value of each pixel within the image sequence. In addition, the modules include at least one refinement module that processes the image sequence on a spatial scale other than the pixel scale.

In contrast, as noted above, Sambonsugi et al. merely teach a system and method that make a single detection of a difference value using known pixel values. A difference value is detected, not predicted. In detection, pixel values are known and subtracted to determine a difference value. Thus, the pixel values must be known before the pixel values can be subtracted to detect a difference value. Nowhere are the Applicants' claimed pixel value predictions disclosed.

Independent Claim 16

Independent claim 16 includes a method for maintaining a background model of an image sequence having a plurality of pixels. The method includes processing the image sequence on a pixel scale so as to determine a current background model and provide an initial assignment for each of the plurality of pixels. The method also includes calculating predictors for a value of each of the plurality of pixels, and refining the pixel processing by processing on a spatial scale other than the pixel scale to further refine at least one of: (a) the current background model; (b) the initial pixel assignments.

On the other hand, as discussed above, Sambonsugi et al. merely teach a system and method that make a single detection of a difference value using known pixel values. A difference value is detected, not predicted. In detection, pixel values are known and subtracted to determine a difference value. Thus, the pixel values must be known before

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the pixel values can be subtracted to detect a difference value. This is vastly different from the Applicants' claimed invention including calculating predictors for a value of each of the plurality of pixels.

Independent Claim 93

Independent claim 93 includes a system for background maintenance of an image sequence having a plurality of pixels. The system includes a pixel processing module that processes the image sequence on a pixel scale and a prediction module that provides at least two predictions for a value of each pixel in the plurality of pixels. Further, the system includes at least one refinement module that processes the image sequence on a spatial scale different from the pixel scale

In contrast, as noted above, Sambonsugi et al. merely teach a system and method that make a single detection of a difference value using known pixel values. Sambonsugi et al. merely detect difference values between respective pixels. A single detection of a difference value is made for each pair of the respective pixels. In particular, Sambonsugi et al. state that "a difference value detector section 31 is used to obtain the difference between the current frame and the first and second reference frames" (col. 15, lines 50-52). Nowhere is the Applicants' claimed prediction module that provides at least two predictions for a value of each pixel in the plurality of pixels disclosed.

Independent Claim 94

Independent claim 94 includes a method for processing an image sequence having a plurality of pixels. The method includes processing the image sequence on a pixel scale to determine a current background model and provide initial assignments to each of the plurality of pixels and calculating a plurality of predictors to provide predictions of a value of each of the plurality of pixels, the predictions based on an actual history of the predicted pixel and a predicted history of the predicted pixel. The method further includes refining the pixel processing by processing on a spatial scale other than the pixel scale to maintain a background model of the image sequence.

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Specifically, the Applicants' specification sets forth a working example whereby there are two predictions of pixel value are made for each pixel. One of the predictions is based on actual history and the other prediction is based on the predicted history of a pixel (page 28, lines 3-5). If the actual value of pixel differs from either one of its two predicted values by more than a certain amount, then that pixel is declared a foreground pixel (page 28, lines 2-3).

In contrast, as noted above, Sambonsugi et al. merely teach a system and method that make a single detection of a difference value using known pixel values. In addition to not teaching multiple predictions, Sambonsugi et al. also fail to teach different types of multiple pixel value predictions. Namely, Sambonsugi et al. nowhere teach the Applicants' claimed feature of making predictions based on: (a) an actual history of the predicted pixel; and (2) a predicted history of the predicted pixel.

Because the Applicants' claimed invention includes features neither taught, disclosed nor suggested by Sambonsugi et al., the Applicants respectfully submit that the rejections of independent claims 1, 11, 16, 93 and 94 under 35 U.S.C. § 102(e) as being anticipated by Sambonsugi et al. has been overcome based on the arguments set forth above and below. Moreover, rejected claims 2-7 depend from independent claim 1, rejected claims 12-15 depend from independent claim 11, and rejected claims 17-19 depend from independent claim 16 and are therefore also novel over Sambonsugi et al. (MPEP § 2143.03). The Applicants, therefore, respectfully request reexamination, reconsideration and withdrawal of the rejection of claims 1-7, 11-19, 93 and 94 under 35 U.S.C. § 102(e) as being anticipated by Sambonsugi et al. based on the arguments above and below.

Section 103(a) Rejections

The Office Action rejected claims 8 and 20 under 35 U.S.C. § 103(a) as being unpatentable over Sambonsugi et al. in view of Jain et al. (U.S. Patent No. 6,263,091). The Office Action contended that Sambonsugi et al. disclose all elements of the

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Applicants' claimed invention except for disclosing speckle removal. However, the Office Action stated that Jain et al. disclose a technique to isolate foreground and background using speckle removal. Therefore, the Office Action asserted that it would have been obvious to use speckle removal as an enhancement technique because speckle removal is well known in the art to aid in the removal of noise, dirt, breaks and smudges in input images.

In response, the Applicants respectfully traverse these rejections based on the following legal and technical analysis. The Applicants submit that Sambonsugi et al. and Jain et al. are lacking at least element of the Applicants' claimed invention. In particular, Sambonsugi et al. and Jain et al. do not disclose, either explicitly or implicitly, the material claimed feature of providing predictions for a value of each pixel. Further, Sambonsugi et al. and Jain et al. fail to appreciate the advantages of this claimed feature. In addition, there is no technical suggestion or motivation disclosed in Sambonsugi et al. or Jain et al. to define this claimed feature. Thus, the Applicants' submit that Sambonsugi et al. and Jain et al. cannot make obvious the Applicants' claimed feature of providing predictions for a value of each pixel.

To make a prima facie showing of obviousness, all of the claimed features of an Applicants' invention must be considered, especially when they are missing from the prior art. If a claimed feature is not disclosed in the prior art and has advantages not appreciated by the prior art, then no prima facie showing of obviousness has been made. The Federal Circuit Court has held that it was an error not to distinguish claims over a combination of prior art references where a material limitation in the claimed system and its purpose was not taught therein. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988). Moreover, as stated in the MPEP, if a prior art reference does not disclose, suggest or provide any motivation for at least one claimed feature of an Applicants' invention, then a prima facie case of obviousness has not been established (MPEP § 2142).

Independent Claims 1 and 16 and Dependent Claims

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As discussed above, independent claim 1 of the Applicants' claimed invention includes a system for maintaining a background model of an image sequence having a plurality of pixels. The system further includes a pixel processing module that processes the image sequence on a pixel scale. In addition, the system includes a prediction module that provides predictions for a value of each of the plurality of pixels. The system also includes at least one refinement module that processes the image sequence on a spatial scale other than the pixel scale.

In contrast, as noted above, Sambonsugi et al. merely teach a system and method that make a single detection of a difference value using known pixel values. Detection is different from prediction. In Sambonsugi et al., the pixel values are not being detected; these pixel values already are known. Only a difference between the pixel values is being determined. The pixel values must be known before the pixel values can be subtracted to detect a difference value. A difference cannot be determined from unknown values.

As also discussed above, independent claim 16 includes a method for maintaining a background model of an image sequence having a plurality of pixels. The method includes processing the image sequence on a pixel scale so as to determine a current background model and provide an initial assignment for each of the plurality of pixels. The method also includes calculating predictors for a value of each of the plurality of pixels, and refining the pixel processing by processing on a spatial scale other than the pixel scale to further refine at least one of: (a) the current background model; (b) the initial pixel assignments.

On the other hand, as discussed above, Sambonsugi et al. merely teach a system and method that make a single detection of a difference value using known pixel values. A difference value is detected, not predicted. This is vastly different from the Applicants' claimed invention including calculating predictors for a value of each of the plurality of pixels.

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In addition, Sambonsugi et al. fail to provide any motivation, suggestion or desirability to modify their object extraction apparatus to include the feature of providing predictions for a value of each pixel. One reason for this is that Sambonsugi et al. is detecting a difference value for pixel values of respective pixels and not predicting the pixel values. Thus, to detect the difference value, the pixel values must be known.

There can be no motivation to predict unknown pixel values by a teaching of detecting a difference value of known pixel values. The two concepts are very different. Thus, absent any type of teaching, motivation or suggestion Sambonsugi et al. cannot render the Applicants' invention obvious (MPEP § 2143.01).

Jain et al. add nothing to the cited combination that would render the Applicants' claimed invention obvious. Jain et al. merely disclose a system and a method for segmenting foreground and background portions of digitized images. The Applicants' claimed feature of providing predictions for a value of each pixel is not discussed. Consequently, no motivation or suggestion for this claimed feature of the Applicants' invention is provided. Absent this teaching, motivation or suggestion, Jain et al. cannot render the Applicants' claimed invention obvious (MPEP § 2143.01).

Sambonsugi et al. and Jain et al. also both fail to appreciate or recognize the advantages of the Applicants' claimed feature of providing predictions for a value of each pixel. More specifically, the use of multiple predictions "provides the pixel processing module 310 with the ability to accurately maintain a model of the background even if the background is briefly concealed by a foreground object" (page 28, lines 11-13). For example, if an actual pixel history and a predicted pixel history are used as two predictors for a value of each pixel, if one predictor becomes corrupted the other predictor will continue to predict the background (page 28, lines 13-15). Neither Sambonsugi et al. nor Jain et al. discuss or appreciate these advantages of the Applicants' claimed feature of providing predictions for a value of each pixel.

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The Applicants, therefore, submit that obviousness cannot be established since neither Sambonsugi et al. nor Jain et al. teach, disclose, suggest or provide any motivation for the Applicants' claimed feature of providing predictions for a value of each pixel. In addition to explicitly lacking this feature, Sambonsugi et al. and Jain et al. also fail to implicitly disclose, suggest, or provide motivation for this feature. Further, both Sambonsugi et al. and Jain et al. fail to appreciate advantages of this claimed feature.

Therefore, as set forth in *In re Fine* and MPEP § 2142, Sambonsugi et al. and Jain et al., either alone or in combination, do not render the Applicants' claimed invention obvious because the references are missing at least one material feature of the Applicants' claimed invention. Consequently, because a prima facie case of obviousness cannot be established due to the lack of "some teaching, suggestion, or incentive supporting the combination", the rejection must be withdrawn. ACS Hospital Systems, Inc. v. Montefiore Hospital, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984); MPEP 2143.01.

Accordingly, the Applicants respectfully submit that independent claims 1 and 16 are patentable under 35 U.S.C. § 103(a) over Sambonsugi et al. in view of Jain et al. based the legal and technical arguments set forth above and below. Moreover, claim 8 depends from independent claim 1 and claim 20 depends from independent claim 16, and are also nonobvious over Sambonsugi et al. in view of Jain et al. (MPEP § 2143.03). The Applicants, therefore, respectfully request reexamination, reconsideration and withdrawal of the rejection of claims 8 and 20.

The Office Action rejected claims 9 and 10 under 35 U.S.C. § 103(a) as being unpatentable over Sambonsugi et al.. The Office Action contended that Sambonsugi et al. disclose all elements of the Applicants' claimed invention including a postprocessing module. Therefore, the Office Action maintained that it would have been obvious for one of ordinary skill in the art to come up with a method wherein the postprocessing module

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provides enhancement after the pixel processing module and before the frame processing module in order to output a better quality sequence of images.

In response, the Applicants respectfully traverse these rejections based on the following legal and technical analysis. In particular, Sambonsugi et al. do not disclose, either explicitly or implicitly, the material claimed feature of providing predictions for a value of each pixel. Further, Sambonsugi et al. fail to appreciate the advantages of this claimed feature. In addition, there is no technical suggestion or motivation disclosed in Sambonsugi et al. to define this claimed feature. Thus, the Applicants' submit that Sambonsugi et al. cannot make obvious the Applicants' claimed feature of providing predictions for a value of each pixel.

Independent Claim 1

As discussed above, independent claim 1 of the Applicants' claimed invention includes a system for maintaining a background model of an image sequence having a plurality of pixels. The system further includes a pixel processing module that processes the image sequence on a pixel scale and a prediction module that provides predictions for a value of each of the plurality of pixels. In addition, the system includes at least one refinement module that processes the image sequence on a spatial scale other than the pixel scale.

In contrast, as noted above, Sambonsugi et al. merely teach a system and method that make a single detection of a difference value using known pixel values. Detection is different from prediction. In Sambonsugi et al., the pixel values are not being detected; these pixel values already are known. Only a difference between the pixel values is being determined. The pixel values must be known before the pixel values can be subtracted to detect a difference value. A difference cannot be determined from unknown values.

In addition, Sambonsugi et al. fail to provide any motivation, suggestion or desirability to modify their object extraction apparatus to include the feature of a

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prediction module that provides predictions for a value of each of a plurality of pixels. One reason for this is that Sambonsugi et al. is detecting a difference value for pixel values of respective pixels and not predicting the pixel values. Thus, to detect the difference value, the pixel values must be known.

There can be no motivation to predict unknown pixel values by a teaching of detecting a difference value of known pixel values. The two concepts are very different. Thus, absent any type of teaching, motivation or suggestion Sambonsugi et al. cannot render the Applicants' invention obvious (MPEP § 2143.01).

In addition, Sambonsugi et al. fail to appreciate or recognize the advantages of the Applicants' claimed feature of a prediction module prediction module that provides predictions for a value of each of a plurality of pixels. More specifically, the use of multiple predictions "provides the pixel processing module 310 with the ability to accurately maintain a model of the background even if the background is briefly concealed by a foreground object" (page 28, lines 11-13). For example, if an actual pixel history and a predicted pixel history are used as two predictors for a value of each pixel, if one predictor becomes corrupted the other predictor will continue to predict the background (page 28, lines 13-15). Sambonsugi et al. do not discuss or appreciate these advantages of this claimed feature of the Applicants' claimed invention.

The Applicants, therefore, submit that obviousness cannot be established since Sambonsugi et al. do not teach, disclose, suggest or provide any motivation for the Applicants' claimed feature of a prediction module that provides predictions for a value of each of a plurality of pixels. In addition to explicitly lacking this feature, Sambonsugi et al. also fail to implicitly disclose, suggest, or provide motivation for this feature. Further, Sambonsugi et al. fail to appreciate advantages of this claimed feature.

Therefore, as set forth in *In re Fine* and MPEP § 2142, Sambonsugi et al. do not render the Applicants' claimed invention obvious because it is missing at least one material feature of the Applicants' claimed invention. Consequently, because a prima

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facie case of obviousness cannot be established due to the lack of "some teaching, suggestion, or incentive supporting the combination", the rejection must be withdrawn. ACS Hospital Systems, Inc. v. Montefiore Hospital, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984); MPEP 2143.01.

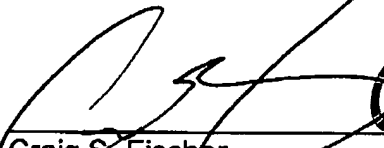
Accordingly, the Applicants respectfully submit that independent claim 1 is patentable under 35 U.S.C. § 103(a) over Sambonsugi et al. based the legal and technical arguments set forth above and below. Moreover, claims 9 and 10 depend from independent claim 1 and are also nonobvious over Sambonsugi et al. (MPEP § 2143.03). The Applicants, therefore, respectfully request reexamination, reconsideration and withdrawal of the rejection of claims 9 and 10.

Conclusion

In view of the arguments set forth above, the Applicants submit that claims 1-20, 93 and 94 of the subject application are in immediate condition for allowance. The Examiner is respectfully requested to withdraw the outstanding rejections of the claims and to pass this application to issue.

In an effort to expedite and further the prosecution of the subject application, the Applicants kindly invite the Examiner to telephone the Applicants' attorney at (805) 278-8855 if the Examiner has any comments, questions or concerns, wishes to discuss any aspect of the prosecution of this application, or desires any degree of clarification of this response.

Respectfully submitted,
Dated: September 18, 2003


Craig S. Fischer
Registration No. 42,535
Attorney for Applicants

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LYON & HARR, L.L.P.
300 East Esplanade Drive, Suite 800
Oxnard, CA 93036-1274
Tel: (805) 278-8855
Fax: (805) 278-8064